

**AMENDMENT
TO CEC LICENSE
FOR THE
MOUNTAINVIEW POWER PROJECT
00-AFC-2**

Submitted by

MOUNTAINVIEW POWER COMPANY, LLC

25770 San Bernardino Avenue

San Bernardino, California 92408-3154

For Submittal to

CALIFORNIA ENERGY COMMISSION

Energy Facilities Siting and Environmental Protection Division

1516 Ninth Street

Sacramento, California 95814

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Prepared by

URS

130 Robin Hill Road, Ste. 100
Santa Barbara, California 93117
805.964.6010 ♦Fax 805.964.0259
Project No. 2235873.03400

AMENDMENT TO CEC LICENSE
FOR THE MOUNTAINVIEW POWER PROJECT 00-AFC-2
MARCH 2004

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INTRODUCTION

1.1 OVERVIEW OF AMENDMENT

On March 21, 2001, the California Energy Commission (CEC) approved the Mountainview Power Project (MVPP) (00-AFC-2). The owner of the MVPP is Mountainview Power Company, LLC (MVPC). The permitted project, as approved in the March 21, 2001 Commission Decision, included a 17-mile, 24-inch diameter natural gas pipeline installed entirely within city street rights-of-way through existing residential, industrial, and commercial areas. Figure 1 shows the project location and Figure 2 provides all of the project components. The Commission Decision indicated that the pipeline would start in the City of Rancho Cucamonga and proceed east through the cities of Fontana, Colton, Rialto, and the County and City of San Bernardino, terminating at the power plant site in the City of Redlands. The Commission Decision specified that the pipeline would require boring under the Santa Ana River. In fact, there are several man-made and natural features that the permitted pipeline route crosses, including:

- Seven railroad crossings, including Union Pacific Railroad (UPRR), Burlington Northern Santa Fe rail line (BNSF), BNSF rail yard, and Metrolink
- Eight stream, creek, river, or wash crossings, including East Etiwanda Wash, San Sevaine Channel, West Fontana Channel, Rialto Channel, Lytle Cajon Channel, Lytle Creek, Twin Creek, and the Santa Ana River (many of which are channelized)

The Commission Decision also called for connecting the gas pipeline into "Line 4000/4002." Lines 4000 and 4002 are two separate, parallel high-pressure gas lines. Where they intersect the proposed gas pipeline alignment, Lines 4000 and 4002 lie on either side of and are separated by the East Etiwanda Wash. This proposed amendment addresses several changes to the pipeline alignment that have resulted from detailed engineering design. MVPC believes that all of the modifications are beneficial to the project and the community.

This petition to amend the project contains all of the information required pursuant to Section 1769 (Post Certification Amendments and Changes) of the CEC's Siting Regulations. The specific project changes and information needed to fulfill the requirements of Section 1769 are contained in Sections 1.0 through 7.0 of this Amendment.

1.2 OVERVIEW OF PROJECT CHANGES

The proposed changes to the MVPP are requested by MVPC in order to reflect final engineering design of the 17.9-mile natural gas line. The gas pipeline will be constructed,

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owned, and operated by Southern California Gas Company (Gas Company). These proposed changes include:

- **Valve Station at East Etiwanda Wash** – In the Commission Decision, the approved gas pipeline alignment was expected to be buried within the existing Arrow Route Highway roadway where the proposed pipeline passes over the East Etiwanda Wash and ties into the gas supply lines (noted as Line 4000/4002 in the Decision), hence having no impact to the wash or habitat in the area. During the Gas Company's review of the pipeline design, it was determined that a valve station is required where the proposed pipeline meets the two gas supply lines to allow a dual gas feed and provide an automatic valve control, internal inspection, and blow down facilities for the natural gas supply line to the power plant. The valve station facilities are necessary to comply with the Pipeline Safety and Improvement Act of 2002 (49 USC 60109c), promulgated in December 2002, and the proposed rulemaking for Department of Transportation (DOT) regulations listed in Title 49 of the Code of Federal Regulations (CFR), Part 192.150. This Act mandates specific internal inspection and pipeline design requirements for all pipelines.
- **Mill Street Crossing at the UPRR** – In the Commission Decision, the approved gas pipeline was generally expected to be buried entirely beneath existing roadways. As such, impacts to Delhi Sand dunes and potentially occurring federally protected species were not anticipated where the proposed pipeline crosses Delhi Sand soils along Mill Street at the UPRR crossing in the City of San Bernardino. During a review of the pipeline alignment, the Gas Company determined that the gas pipeline could not be installed in the Mill Street Bridge that spans the UPRR. The Mill Street Bridge was deemed inadequate to support the gas pipeline because of the age of the bridge and possible need to replace or retrofit the bridge to comply with engineering seismic design specifications. There was also insufficient clearance for the active rail line to allow the gas pipeline to hang from the side of the bridge. The Gas Company determined that a horizontal bore under the UPRR tracks just to the north of the Mill Street Bridge was required.
- **Tippecanoe Crossing at the Santa Ana River** – In the Commission Decision, the approved gas pipeline was expected to be directionally bored approximately 100 feet under the Santa Ana River at Tippecanoe Avenue to avoid impacts to the Santa Ana River. The directional drill was to be located parallel to the west side of the Tippecanoe Avenue Bridge. Boring was to be initiated on the south side of the river and completed on the north side along the Tippecanoe Avenue Bridge, resulting in 0.9 acre of temporary impacts at the boring pit locations. Due to the technical difficulty of directionally boring 100 feet below the Santa Ana River and the high cost of construction, difficulties in maintaining the line, and the total distance and depth of the bore, the Gas Company

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developed another design alternative. The Gas Company entered into an agreement with the City of San Bernardino for a Road Encroachment permit for the 24-inch gas pipeline to allow the use of an open cell through the Tippecanoe Bridge over the Santa Ana River. This permit will reduce the impact to natural resources on and along the Santa Ana River. Under the new design, the impacts to the Santa Ana River will be limited to temporary pedestrian access beneath the bridge for safety escape route purposes and for occasional future maintenance. The riverbed area beneath the bridge is already subject to occasional pedestrian and vehicle access for other bridge maintenance and flood control activities.

- **Additional Construction Laydown Areas** – In the Commission Decision, it was assumed that the contractor constructing the gas line would use the laydown area at the plant site. Given the length of the gas line, it is not feasible to use the laydown area at the plant site. The Gas Company has identified 13 potential laydown areas of which three to four will be chosen by the construction contractor and used for equipment storage, temporary soil storage, and for laydown of construction materials. The Gas Company has identified one additional laydown area to be used as a temporary workspace during the hydrostatic testing. Therefore, a total of four to five additional laydown areas will be added to the project for use during the construction of the gas line.

Table 1.2-1 provides a summary of the changes and the benefits associated with each modification. Refer to Section 2.0 of this Amendment for more specific details of the project changes.

1.3 NECESSITY OF PROPOSED CHANGES

Section 1769 (a)(B) and (C) of the CEC Siting Regulations requires a discussion of the necessity for the proposed modifications to the MVPP and asks whether the modifications are based on information known to the petitioner during the certification proceeding. The proposed project changes are needed to incorporate final engineering design of the gas line and allocate sufficient contractor laydown space during construction. These changes were not known during the certification proceeding, but were a result of post-certification engineering and availability of more recent data on construction needs.

1.4 SUMMARY OF ENVIRONMENTAL IMPACTS

Section 1769 (a)(E) of the CEC Siting Regulations requires an analysis to address the impacts of proposed modifications on the environment and the proposed measures to mitigate any significant adverse impacts. In addition, Section 1769 (a)(F) of the Siting Regulations

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requires a discussion of the impact of proposed modifications on the facility's ability to comply with applicable laws, ordinances, regulations, and standards (LORS). Section 3.0 of this Amendment includes a discussion of the potential impacts of the proposed changes on the environment. It also includes a discussion of the applicability of existing and proposed mitigation measures, as well as a discussion of the consistency of the proposed modification with LORS.

1.5 CONSISTENCY OF CHANGES WITH LICENSE

Section 1769 (a)(D) of the CEC Siting Regulations requires a discussion of each proposed project modification and asks whether the modification is based on new information that would change or undermine the assumptions, rationale, findings, or other bases of the CEC's final decision on the original Application for Certification (AFC). An explanation of why the proposed changes should be permitted is also required.

None of the proposed modifications undermines the assumptions, rationale, findings, or other bases of the CEC's final decision in the original AFC. The overall alignment of the gas line will not change as a result of the proposed modifications. The addition of the valve station at the East Etiwanda Wash will enable the project to comply with the Pipeline Safety and Improvement Act of 2002 and proposed rulemaking for DOT regulations listed in Title 49 of the CFR, Part 192.150. The bore under the UPRR will allow for better maintenance of the line, in the event that it is required in the future, and the approved design at this location was not technically feasible. The Tippecanoe Avenue crossing at the Santa Ana River will reduce the impacts on the environment and allow for maintenance on the gas line. All of the proposed changes are necessary in order to construct the pipeline and avoid any new impacts within the same right-of-way as approved by the CEC.

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**TABLE 1.2-1
SUMMARY OF PROJECT CHANGES**

Modification Description	Currently Licensed	Proposed Modification	Rationale / Necessity
Valve station at East Etiwanda Wash	Pipeline buried within the existing Arrow Route Highway roadway and connecting into "Line 4000/4002"	Construct a valve station to allow for dual feed from Lines 4000 and 4002	Compliance with Pipeline Safety and Improvement Act of 2002, allow for dual feed, internal inspection, and blowdown facilities
Mill Street crossing at the UPRR	Pipeline buried entirely beneath existing roadways	Pipeline bored under the UPRR tracks north of the Mill Street bridge	Pipeline cannot be installed in Mill Street bridge or hung from bridge due to bridge design limitations.
Tippecanoe crossing at the Santa Ana River	Pipeline directionally bored 100 feet under the Santa Ana River	Pipeline installed in open cell of Tippecanoe Avenue Bridge over Santa Ana River	Minimizes potential environmental impacts, difficulties of long-term maintenance, and technical difficulties with construction and expense of directional bore.
Additional construction laydown areas	Use of laydown area at plant site	Addition of four to five laydown areas for gas line construction	Impractical to use laydown area at plant site and to decrease construction traffic traveling back and forth from plant site laydown area. Having several staging areas along route will help reduce the total number of vehicles required for construction (dump trucks, etc.).

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DESCRIPTION OF PROJECT CHANGES

2.1 INTRODUCTION

In compliance with CEC Siting Regulations Section 1769(a)(A), this section of the Amendment includes a description of each of the proposed project modifications, as well as a discussion regarding the necessity for the changes.

The original AFC was submitted in January 2000 and the project was approved by the CEC on March 21, 2001. In July 2003, the Gas Company completed final engineering design of the 17.9-mile gas line. On October 2, 2003, MVPC submitted a Biological Assessment to the U.S. Environmental Protection Agency (EPA) to reinstate Section 7 consultation for species protected under the Endangered Species Act. MVPC understands that the U.S. Fish and Wildlife Service (USFWS) intends to issue a separate Biological Opinion for the gas line portion of the project and that the Biological Opinion issued on April 21, 2001, will not change.

2.2 PROPOSED PROJECT CHANGES

As briefly outlined in Section 1.0, the proposed changes are:

- Valve station at East Etiwanda Wash
- Mill Street crossing at the UPRR
- Tippecanoe Avenue crossing at the Santa Ana River
- Additional contractor laydown areas

2.2.1 Valve Station at East Etiwanda Wash

The proposed valve station has been located as close as practical to the permitted pipeline and the two existing 36-inch high-pressure gas supply lines (Lines 4000 and 4002) to reduce the length of connected piping ("stranded pipe") from the existing pipelines to the station header for maintenance purposes and to reduce impacts to natural resources. The pipes connecting the valve station to the proposed gas line and existing supply lines will avoid East Etiwanda Wash. The modification will result in no impact to the wash, and a total of 0.37 acre of temporary impacts and 0.16 acre of permanent impacts to habitat in the area, as shown on Alignment Sheet 2582-A-101 and 2582-P-101 of Appendix B.

Valve Station. The proposed valve station is located on the north side of Arrow Route Highway on private property immediately east of and adjacent to East Etiwanda Wash in Rancho Cucamonga. The valve station will be set back 40 feet from the existing street right-

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of-way to comply with local set back requirements and allow for future road widening of Arrow Route. The valve station will connect to the permitted gas line, gas supply Line 4002, and gas supply Line 4000. These connections are described in greater detail below. Gas supply Line 4000 is located on the east bank of the East Etiwanda Wash and gas supply Line 4002 is located on the west bank of the wash. Both gas supply lines are 36-inch diameter high-pressure gas pipelines and are owned and maintained by the Gas Company. The gas supply will be controlled through valves located within the proposed valve station, and will provide gas supply from one of the existing 36-inch pipelines (as the primary line), and the other pipeline will serve as a backup (or secondary source of natural gas) depending upon operational needs. The valve station is critical to provide automatic valve control and isolation and de-pressurization of the pipeline for maintenance work and as a staging site for federally and state-mandated in-line pipe inspections.

The dimensions of the valve station will be 50 feet north to south by 120 feet east to west, enclosed by a chain-link fence. Permanent aboveground facilities within the valve station include hand wheel operators for two 10-inch valves, an 8-inch valve, and three hydraulic/pneumatic actuators for the 24-inch valves. Other permanent aboveground facilities include an 8-inch blowdown stack, approximately 8 feet tall; a 24-inch pipe riser and flange at the east end of a 14-foot by 50-foot concrete work slab; and an 8-foot-high chain-link fence with two 20-foot vehicle access gates on the south side. Maintenance staff will access the valve station via two 20-foot-wide by 20-foot-long gravel access roads from the future road right-of-way. In addition, three emergency pedestrian access gates are located along the perimeter of the fence (on the south, north, and west sides of the permanent valve station fence). The 24-inch pipeline and valves will be located below ground. Adjacent land to the east and northeast of the valve station parcel (which was a part of the adjacent parcel prior to condemnation by the Gas Company) is owned by a pipe manufacturer, which is planning on using the land for pipe storage. See Appendix B for a site plan and elevation drawings of the valve station. The aboveground facilities at the valve station are shown in a site elevation drawing provided in Appendix B (drawing 95014-009.PLN).

Noise resulting from routine operation of the valve station shall not exceed applicable City of Rancho Cucamonga ordinances. Noise from routine blow downs will be reduced by controlling the flow of gas and by installation of a silencer on the blowdown stack.

Connection to Proposed Gas Line. The proposed valve station will connect to the proposed gas pipeline with a 24-inch pipe passing southward from the valve station to the proposed pipeline at Arrow Route. The distance between the valve station and the edge of pavement on Arrow Route is 60 feet. The connecting pipe will be installed below ground in an unpaved,

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previously disturbed area adjacent to the eastern bank of East Etiwanda Wash. The trench will be 36-inches wide and a total of 66 inches deep. See Appendix B drawing 2582-A-101.

Connection to Line 4002. Line 4002 will be connected to the valve station by approximately 450 feet of 24-inch connecting pipe, which will pass southward from the valve station to Arrow Route and will be installed within the paved Arrow Route roadway westward to Line 4002 on the west side of East Etiwanda Wash. Within the paved portion of Arrow Route, the 24-inch pipeline will be conventionally bored beneath the existing concrete box culvert for East Etiwanda Wash (Sta. 62+35). Both the boring and receiving pits will be located within the paved portion of Arrow Route in the eastbound lane. Therefore, no impacts to East Etiwanda Wash will occur as a result of installing the connecting pipeline from the valve station to the tie-in to Line 4002 (Sta. 60+00).

Connection to Line 4000. The proposed valve station site abuts the easement for Line 4000 on the same (east) bank of East Etiwanda Wash, and will be directly connected to Line 4000 via approximately 100 feet of 24-inch connecting pipe. An approximately 10-foot-wide by 20-foot-long excavation will be necessary to complete the tie-in at Line 4000, where a 10-foot-long segment of Line 4000 will need to be cut out and replaced with a "T" joint in order to connect the 36-inch Line 4000 to the 24-inch pipeline (approximate Sta. 63+35). The temporary workspace required for construction of the valve station and tie-in to Line 4000 is shown on Alignment Sheet 2582-A-101 in Appendix B.

Temporary Work Area. A temporary construction work area of 0.37 acre will be required for construction of the valve station and tie-in to Line 4000. The temporary work area is located immediately south and southeast of the valve station on disturbed, unvegetated soils. Of the 0.37-acre temporary disturbance, approximately 450 square feet (0.01 acre) will occur along the eastern bank of East Etiwanda Wash for the Line 4000 tie-in.

2.2.2 Mill Street Crossing at the Union Pacific Railroad

The Gas Company evaluated the potential for both conventional and directional bores under the bridge. The antiquated bridge design has several concrete supports buried to depths up to 40 feet below ground surface. Therefore, a conventional bore was determined to be infeasible due to the required depths of greater than 40 feet for the bore pit locations on either side of the bridge. The conventional bore would result in increased safety risks to workers, difficult technical challenges, and greater long-term maintenance risks than a horizontal bore located 6 to 10 feet below grade and 60 feet to the north. A directional bore would have run the risk of encountering, and being stopped by, the Mill Street Bridge supports that are buried more than

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40 feet below the surface of the UPRR tracks, and would have required equipment to be staged and operated around the clock for the duration of the drill in front of residences fronting Mill Street.

The proposed realignment, which provides for a horizontal bore less than 60 feet to the north, allows for the safest pipe installation and most accessible location for long-term pipeline maintenance.

Trenching and Boring Activities. At the UPRR crossing, the proposed gas pipeline will deviate from Mill Street and proceed to the north, parallel the railroad tracks for a short distance, and will then be trenched down to the bore pits adjacent to the UPRR tracks. The pipe will then be bored at a depth of approximately 8 feet below ground surface (bgs) under the UPRR tracks. Refer to Alignment Sheet 2582-A-154 for a plan view and cross-sectional drawing of the horizontal bore.

At Station 641+00 on the west side of the crossing, the trenched pipe segment will bend 90 degrees to the south and will extend 46 feet to tie in with the 24-inch pipeline located within Mill Street. Of this 46-foot length, approximately 20 feet are located within the Delhi sands and the remaining 26 feet are within the Mill Street (paved) right-of-way. On the east side of the crossing, the pipe will be installed within a 52-foot-long trench upslope from the tie-in and then bend 90 degrees south at Sta. 643+44 where the trench will continue another 67 feet to tie in to the Mill Street pipeline section. Of the 67-foot trench section tie-in to the Mill Street pipeline segment, approximately 40 feet is within the Delhi sands. The remaining 27 feet is within the paved roadway.

Equipment will remove excess soil and excavate the 15 x 30-foot bore pit and the 10 x 10 foot receiving pit on each side of the UPRR crossing. The bore pits will be excavated to a depth sufficient to allow the top of the pipe to be installed and covered by a minimum of 6 feet of soil. For a 24-inch diameter pipe at the UPRR crossing, the bore pit and receiving pit will vary between 10 to 18 feet below ground surface, based on the slope of the soil adjacent to the tracks (see Alignment Drawing 2582-A-154). Shoring boxes will be installed to support the bore pits on both sides of the UPRR tracks.

Based on the anticipation of loose soils at the site, the actual trench width will be three times wider (3:1 slope ratio) at the surface than a comparable trench created in areas of consolidated soils (1:1 slope ratio). Consequently, additional workspace (totaling 0.54 acre) is required to accommodate the wider trench opening, the placement of boring pits, as well as the excavating and boring equipment and dump trucks involved with trenching activities.

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Shoring boxes are required at the boring pits. Excess trench spoil will be hauled off for temporary storage, and then later returned to the site for backfill and restoration.

The casing pipe will be horizontally bored and jacked from the bore pit on the east side of the tracks and will exit at a receiving pit on the west side of the rail lines. While the cased section of the pipe is installed beneath the UPRR tracks, the construction crews will trench from the bore pit up the slopes on either side of the crossing. Pipe segments will be placed within the trench on both the east and west sides of the crossing and tied in (welded) to each end of the section of cased pipe. Following pipeline installation, excess spoil temporarily hauled away during the excavation activities will be returned to the site, the 0.54-acre area of disturbance will be graded to original slope ratios and contours, and will be revegetated with native plant species at the conclusion of construction.

The construction will temporarily impact a total of 0.54 acre of Delhi sands soil (0.22 acre on the east side of the railroad tracks and 0.32 acre on the west side of the tracks). All impacts of the action will be temporary except for two permanent, aboveground casing vents. A two-inch diameter pipe will be installed at each end of the casing pipe and brought up to the surface, 4 feet above grade. The casing vent is installed to provide access to check for leakage during routine leak surveys and allow air circulation throughout the casing. One vent is installed at the bottom and the other on top to promote the air circulation. In addition, 0.25-inch mesh screens are installed over the openings on the 2-inch pipe to keep debris from entering.

Schedule. The construction schedule for the gas pipeline crossing under the UPRR tracks is estimated to occur over 34 working days. All construction-related ground disturbing activities will avoid the August-September flight period of the Delhi sands flower-loving fly (DSF). At a minimum, agencies will be notified of the construction schedule within 30 days of ground breaking.

2.2.3 Tippecanoe Avenue Crossing at the Santa Ana River

The gas pipeline crossing at the Tippecanoe Avenue Bridge includes four components: gas pipeline installation in the bridge; temporary construction workspace and staging areas on the north and south sides of the river along Tippecanoe Avenue; pedestrian access under the bridge; and existing access roads. Project description details for each are described below. Therefore, boring pits adjacent to San Bernardino kangaroo rat suitable and occupied habitat will no longer be necessary. Refer to Appendix B (Alignment Sheets 2582-A-180, 2582-A-181, and 2582-A-182) for a detail of the bridge crossing over the Santa Ana River.

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Gas Pipeline Installation. The gas pipeline will be installed within a 30-inch diameter (maximum) casing, which will be installed in an open cell located in the Tippecanoe Avenue Bridge where it crosses the Santa Ana River. To access the cell and install the pipeline and casing, construction crews will excavate one hole in the roadway adjacent to both the north and south ends of the Tippecanoe Avenue Bridge, and a total of four holes in the surface of the bridge. Emergency escape egress for construction workers working within the open cell of the bridge will be provided via two existing access holes beneath the bridge, as described below. The gas pipeline will be inserted into the cell via a surface hole at one end of the bridge. The entire installation procedure will remain inside Tippecanoe Avenue Bridge. One southbound lane will be temporarily closed to accommodate the construction activity.

Pedestrian Corridor. All of the construction activities associated with installation of the gas pipeline through the Tippecanoe Avenue Bridge open cell will be conducted from the top of the bridge. Limited pedestrian traffic directly under the bridge is required to provide a worker emergency escape route. The associated pedestrian traffic within the Santa Ana River will be limited to a 10-foot-wide pedestrian corridor directly beneath the Tippecanoe Avenue Bridge, centered on the alignment of the existing access holes. The pedestrian corridor will parallel the bridge across the Santa Ana River for a total length of approximately 750 feet. The existing Tippecanoe Avenue Bridge structure includes six bridge supports. At each of the six bridge supports, the pedestrian corridor will circumnavigate the support to the east. The pedestrian corridor includes the south bank and north bank rock revetment, which will serve as access points to the river corridor. The total area of the pedestrian corridor is 7,500 square feet (0.17 acre). Refer to Alignment Drawing 2582-A-181 in Appendix B, which shows the pedestrian corridor. The Gas Company expects that two to four workers will need to access the pedestrian corridor daily to set up ladders that will serve as an emergency escape route for construction workers working within the open cell of the bridge. The workers will use existing paths within the riverbed to hand-carry ladders down the rock revetment, set them up at the holes beneath the bridge, and remove the ladders each night. This access will be necessary for a total of 30 working days during construction. An approved biological monitor will accompany two-man crews accessing the riverbed in order to minimize impacts to special status species habitat to the greatest extent possible.

Temporary Construction Workspace and Staging Areas. Excavations, entirely within the Tippecanoe Avenue roadway, will be required at each end of the bridge to access the abutments to put the pipeline through. The excavations will result in a small amount of trench spoil that will be hauled off for temporary storage and returned to backfill the road excavation. Equipment required to excavate the roadway will be stored at two equipment staging areas, approximately 138 feet long by 30 feet wide (north side) and 82 feet long by 25

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feet wide (south side) and total 0.14 acre of temporary disturbance. The staging areas are located adjacent to both ends of the bridge on existing unpaved flood control access roads that parallel and lie on top of the flood control levees at the Santa Ana River. Please refer to the Alignment Drawings 2582-A-180, 181, and 182 in Appendix B for details.

Access Roads. Construction crews will use existing flood control access roads to access the equipment staging areas and bridge abutment. No improvements to the roads will be required. The access roads are shown on Alignment sheets 2582-A-180 and 182 of Appendix B.

Schedule. The construction schedule for the gas pipeline crossing of the Santa Ana River is estimated to take 40 days from mobilization to demobilization. A complete construction schedule will be provided to the agencies approximately 30 days prior to the start of construction.

2.2.4 Additional Contractor Laydown Yards

The Gas Company has identified a total of 13 possible contractor laydown yards (refer to Figure 2 for the location of the 13 contractor yards). Once a contract has been negotiated with the gas line construction contractor, the contractor will identify three to four sites from the list provided in Table 2.2-1 below and negotiate leases for these sites (see Figure 2 for the location of the contractor yards). The 13 laydown yards have been located evenly along the pipeline route to reduce the amount of construction-related traffic. The three to four laydown areas will be used for vehicle and equipment storage and service areas, along with serving as a laydown area for construction materials.

In addition to the 13 laydown yards, the Gas Company has identified an additional site directly adjacent to the pipeline route to conduct hydrostatic testing of the pipeline. While hydrostatic testing was not specifically discussed in the AFC or in the CEC's Commission Decision, it is consistent with typical pipeline construction practices. The Gas Company anticipates using water from the plant site to perform the hydrostatic test and then discharge the water into the Rialto Channel, located in the City of Rialto. Prior to construction, the Gas Company will obtain a discharge permit from the Santa Ana Regional Water Quality Control Board (RWQCB) and follow the guidelines in the permit prior to discharge (i.e., sampling of water prior to discharge, flow rate, etc.).

Each of the 13 laydown yards along with the hydrostatic testing area have been surveyed for potential environmental impacts and have consequently been chosen to minimize impacts to

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ENVIRONMENTAL ANALYSIS OF PROJECT CHANGES

Sections 1769(a)(E) and (F) of the CEC Siting Regulations require that the following environmental information regarding proposed changes be addressed as part of any post-certification amendment:

- An analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts (Section 1769(a)(E))
- A discussion of the impacts of the modifications on the facility's ability to comply with applicable LORS (Section 1769(a)(F))

The analysis is organized by environmental discipline in Sections 3.1 through 3.17. These disciplines are the same as the disciplines analyzed in the original AFC. Each section contains a discussion of the potential change to impacts due to the proposed project changes.

In summary, the proposed modifications to the approved MVPP are needed to incorporate final engineering design of the gas line and allow for sufficient contractor laydown areas during construction, which is expected to result in insignificant impacts to the environment, the public, and the adjacent property owners.

3.1 AIR QUALITY

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new impacts to air quality as identified in the final Commission Decision. The majority of the pipeline installation will occur within existing paved roadways. In accordance with CEC Conditions of Certification (COC) AQ-C3, a fugitive dust mitigation plan for construction will be prepared and submitted to the CEC for approval prior to construction. Compliance with this plan will reduce construction-related dust from trenching and boring activities along the route as well as from activities within the designated construction laydown areas. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.2 GEOLOGIC HAZARDS AND RESOURCES

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new impacts to geologic resources or hazards as identified in the final Commission Decision. The project modifications will not significantly change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

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observed within 1,000 feet of the action area during June 2003 botanical surveys are described below.

A very small colony consisting of one large flowering individual with eight small individuals was observed approximately 300 feet east of Tippecanoe Avenue Bridge in the center of the channel. One small plant was observed approximately 50 feet east of the bridge in the central part of the channel. Three small colonies of Santa Ana River woolly star were identified west of Tippecanoe Avenue Bridge. A group of one large flowering plant and 13 small plants were observed approximately 850 feet west of the bridge on the northern side of the channel. Another colony approximately 85 feet west of the bridge on the southern side of the channel consisted of three large flowering plants and one seedling. A large colony approximately 300 feet west of the bridge in the central portion of the channel included nine large flowering plants and 14 seedlings covering a 40 feet by 20 feet area. All colonies observed were located on raised terraces in the channel consisting of sandy soil with scattered gravel and cobbles.

Delhi Sands Flower-Loving Fly (*Rhaphiomidas terminatus abdominalis*)

The DSF is a large insect in the Dipteran family *Mydidae*. The DSF was listed as an endangered species by the USFWS on September 23, 1993, and the Recovery Plan for the species was published in 1997. Critical habitat was not designated for DSF. The historic range of the DSF extended across approximately 40 square miles of the Colton Dunes (Delhi soil series) in northwestern Riverside and southwestern San Bernardino Counties in California. Due to human activities including urban, commercial, and agricultural development, the present distribution of the DSF is less than 2 percent of its former range. As of 1997, the DSF was currently restricted to 12 known sites (encompassing approximately 450 acres of suitable habitat) scattered throughout its historic range.

During the development of the 17.9-mile gas pipeline construction drawings and the revision to the Mill Street crossing at the UPRR design, it became apparent that potential DSF habitat was present within the UPRR right-of-way. Based on a review of the 1999 survey report, it was confirmed that DSF protocol surveys were not conducted at this location. DSF protocol surveys were not specifically conducted where the gas pipeline crosses the UPRR at Mill Street.

On October 30, 2001 and again on December 15, 2001, Gilbert Goodlett, a biologist permitted to conduct DSF surveys (USFWS Permit Number TE005535-0; expiring March 1, 2003), reviewed the site. Since both of these site reviews were outside of the DSF flight period, the primary focus was on habitat characteristics. Results of Gilbert Goodlett's

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reconnaissance-level survey effort in 2001 identified relatively poor DSF habitat quality at the Mill Street Crossing of the UPRR.

The Mill Street Crossing of the UPRR is regularly disturbed by human and equestrian use as evidenced by wide trails and areas clear of vegetation. One of the DSF Recovery Plan's (1997) requirements for de-listing the species states, "*the sites of all 8 [extant] populations... are managed to maintain... sparse total native vegetation cover (no more than 20 percent)...*" Excluding highly disturbed areas, the project area greatly exceeds recommended vegetation densities and is dominated by invasive exotics. Invasive species covered much more area relative to native species with relative cover densities estimated at 80 percent invasive species and 20 percent native species. Other identified threats to recovery present at the site include off-highway vehicle (OHV) use and extensive equestrian and pedestrian trampling.

The UPRR corridor at Mill Street is located within the Colton Recovery Unit described in the DSF Recovery Plan (1997). The nearest recorded individuals of the species are located [distance pending from USFWS].

Environmental Consequences

East Etiwanda Wash at Arrow Route Highway

The proposed changes to the project, including the proposed construction of a valve station at East Etiwanda Wash, will result in a total of 0.37 acre of temporarily disturbed habitat associated with the work area and pipe installation; and 0.02 acre of permanent impacts to riparian woodland and 0.14 acre of ruderal habitats during the construction of the valve station.

Delhi Sands at Mill Street Crossing over the Union Pacific Railroad

The proposed changes to the project, including the proposed trenching and boring of the gas pipeline under the UPRR at the Mill Street Bridge will impact 0.54-acre of relatively poor quality habitat with high densities of invasive exotic vegetation. The pipeline corridor area occurs within a region determined by the USFWS to contain 120 acres of restorable habitat (Recovery Plan, 1997). The 0.54 acre of temporary disturbance constitutes less than 0.5 percent of the estimated restorable habitat. The disturbed area will be restored through maintaining vegetation densities less than 30% of total cover.

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Santa Ana River at the Tippecanoe Avenue Bridge

The proposed changes to the project, including the proposed gas pipeline installation in a cell through the Tippecanoe Avenue Bridge over the Santa Ana River, would potentially result in temporary impacts associated with the 0.17-acre pedestrian corridor and 0.14-acre equipment laydown area. The pedestrian corridor is located within the bed and rip-rap bank of the Santa Ana River through unvegetated streambed, riparian scrub, and Riversidean alluvial fan sage scrub habitats. The equipment laydown areas are located immediately west of the Tippecanoe Avenue Bridge at the north and south ends on flood control access roads. Therefore, impacts to vegetation are avoided. Foot traffic beneath the bridge will be limited to the pedestrian corridor, and will not result in impacts to vegetation or listed/proposed species of concern.

Mitigation Measures

MVPP proposed the following mitigation measures in the October 2003 Biological Assessment.

East Etiwanda Wash Valve Station at Arrow Route Highway Mitigation

The following mitigation measures are designed to minimize and avoid impacts to biological resources within East Etiwanda Wash. Mitigation is as follows:

Biological Monitoring: Full-time construction monitoring will occur to ensure implementation of mitigation measures.

Fencing Work Area: The perimeter of the construction area, including the valve station, work area, and pipe connections, will be delineated with exclusionary fencing buried to a depth of at least 12 inches to exclude the SBKR. No burrows have been observed at the site; however, delineated work areas will be trapped for the SBKR per an agency agreed-upon trapping plan approved prior to work start-up.

Restoration: Following construction, all areas of temporary disturbance will be regraded, topsoil will be re-distributed, and revegetation will occur per an agency agreed-upon revegetation plan prepared prior to commencing ground disturbing activities at this location.

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Mill Street Crossing Mitigation

The following mitigation measures are designed to minimize and avoid impacts to biological resources at the Mill Street Crossing. Mitigation is as follows:

Biological Monitoring: Full-time construction monitoring will occur to ensure implementation of mitigation measures.

Fencing Work Area: Construction fencing to limit contractor crews and vehicles to the planned workspace area will delineate the perimeter of the work area.

Timing: Construction will occur outside of the August-September "flight period" of the DSF.

Restoration: Following construction, trench and bore pits will be backfilled and returned to existing grade, topsoil will be replaced, and vegetation maintenance will be conducted in accordance with USFWS conditions stated in the revised Biological Opinion.

Santa Ana River Mitigation

The following mitigation measures are designed to minimize and avoid impacts to sensitive resources within the Santa Ana River. With implementation of the proposed mitigation measures, no impacts to SBKR or the Santa Ana woolly star are anticipated to result from foot traffic use of the river to install emergency egress ladders into the open cell during the installation of the gas pipeline in the Tippecanoe Avenue Bridge. Proposed mitigation measures are described below:

Biological Monitoring: The biological monitor will establish and flag a temporary pedestrian corridor within the Santa Ana River that avoids SBKR burrows and woolly star plants. A biological monitor will verify that all pedestrian activities remain within the approved corridor and that equipment used for bridge access is limited to ladders and hand tools. All equipment will be removed each night. Each morning and evening the biological monitor will check the pedestrian path for signs of SBKR. If employees observe a kangaroo rat, or if rodent holes develop within the established walkway, the biological monitor will be notified. The biological monitor will relocate a portion of the walkway to avoid any new burrows that have been observed. All observations of SBKR and sign within or immediately adjacent to the project site at the Tippecanoe Avenue

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bridge will be reported in a post-construction compliance report to be provided to USFWS.

Avoidance Areas: All Santa Ana River woolly star individuals and colonies within 250 feet of the Tippecanoe Avenue Bridge crossing of the Santa Ana River action area will be flagged and monitored for avoidance.

Fencing Equipment Areas: Exclusionary fencing will be installed around the perimeter of the equipment areas and buried to a depth of at least 12 inches to exclude burrowing animals. Delineated areas will be trapped for the SBKR per an agency-agreed upon trapping plan approved prior to work start-up. No burrows have been observed in the equipment area; however, installation of this fence will be monitored to avoid impacts to new or previously unobserved burrows.

Habitat Compensation

Habitat compensation is proposed to compensate for loss of habitat for listed species. The overall *goals* of the habitat compensation are:

1. Ensure continued/improved ecological function for the Delhi sands flower-loving fly, SBKR, and Santa Ana River woolly star in the immediate action area of the project
2. Contribute to an offsite Conservation Area for SBKR consistent with the criteria of the "Final Designation of Critical Habitat for the SBKR; Final Rule" (USFWS, 2002)

The *objectives* specific to these goals are as follows:

1. Minimize impacts to DSF, SBKR, and Santa Ana River woolly star habitats within the region
2. Improve DSF and SBKR habitat suitability during onsite restoration following the completion of construction
3. Contribute funds to secure a parcel of land with SBKR habitat. Arrange for an endowment, which will provide continued funds for protection and adaptive management of the parcels that are purchased.

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San Bernardino Kangaroo Rat

Habitat compensation is proposed for the temporary loss of 0.51 acre of SBKR critical habitat, permanent loss of 0.16 acre of SBKR critical habitat, and potential permanent impacts through loss of individual SBKR. Temporary loss of habitat will occur during construction at East Etiwanda Wash at Arrow Route Highway and the Tippecanoe Avenue Bridge Crossing of the Santa Ana River. Permanent loss of habitat will occur upon completion of the valve station at East Etiwanda Wash. No permanent habitat impacts are associated with construction at the Tippecanoe Avenue Crossing.

The East Etiwanda Wash action area is of moderately to highly degraded SBKR habitat quality. Presence of the SBKR at the valve station at East Etiwanda Wash is unlikely; however, protocol surveys will be conducted at East Etiwanda Wash prior to construction. Presence of the SBKR is known at the Tippecanoe Crossing of the Santa Ana River. Construction at East Etiwanda Wash at Arrow Route Highway is expected to last 46 days. Construction at the Tippecanoe Crossing of the Santa Ana River is expected to last 40 days.

The area of temporary disturbance at East Etiwanda Wash at Arrow Route Highway will be reseeded with native species immediately after the close of construction, per an agency agreed-upon seed mix. No vegetated areas will be disturbed at the Tippecanoe Crossing of the Santa Ana River. At both locations, construction and equipment staging areas will be delineated with exclusionary fencing buried to a depth of at least 12 inches to exclude burrowing animals. Although no burrows were observed at either location, delineated work areas will be trapped for the SBKR per an agency agreed-upon trapping plan approved prior to work start-up. Proposed compensation is listed in Table 3.5-1.

Table 3.5-1
Proposed Habitat Compensation Package

Impacted Habitat	Temporary Impacts	Permanent Impact	Rounded Total
San Bernardino Kangaroo Rat Critical Habitat	0.51 ac @ 1:1 = 0.51 ac	0.16 ac @ 3:1 = 0.80 ac	2 ac

Delhi Sands Flower-Loving Fly

No habitat compensation for DSF is proposed for the 0.54-acre work area at the Mill Street Crossing at the UPRR. The DSF is unlikely to occur at this site and the habitat is moderately

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to highly degraded; therefore, no impacts to DSF are anticipated to result from the construction at this site.

Santa Ana River Woolly Star

No habitat compensation for Santa Ana River woolly star is proposed for the 0.17-acre pedestrian foot traffic corridor located within the Santa Ana River. No impacts to Santa Ana River woolly star are anticipated to result from the pedestrian foot traffic beneath the bridge with proper implementation of the proposed mitigation measures, described above.

3.6 CULTURAL RESOURCES

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new cultural resource impacts. Seven cultural resources are known to be located within the 17.9-mile gas pipeline's area of potential effect (APE). These resources include a remnant of a historic road, several original water conveyance system components from the mid to late 1800s, and a railroad line. However, the information about four of these resources is based on incomplete or vague references, and therefore the condition of four of the seven resources is indeterminate. The archaeological survey of the 17.9-mile natural gas pipeline conducted in 1999 did not locate any previously unrecorded cultural resources. No additional cultural resources are located within the APE of the proposed project changes.

Prior to construction, in accordance with CUL-2 and CUL-3 (see the 2004 CRMMP), the project Designated Cultural Resources Specialist (DCRS) will review the result of MVPC's staking of the project components and maps depicting the final engineered location of project facilities. In accordance with CUL-8, the DCRS will ensure that any additional field surveys will be conducted should there be a need to survey any new location(s) not subject to previous survey, or examine any site locations in reference to final engineering designs.

In accordance with the CEC Final Decision, preconstruction mitigation will include an employee cultural resource-training program (CUL-4). Pursuant to CUL-9, the DCRS, or at his direction a qualified cultural resources monitor, will be at the project location during the period of ground-disturbing construction whenever construction is in the immediate vicinity of a known cultural resource. In addition, the DCRS or his designee will be onsite as needed to assess resources should they be discovered during construction, and to conduct monitoring of ground disturbance in non-sensitive areas as determined necessary by the DCRS.

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In addition to monitoring all known resource locations, cultural resources monitoring will occur intermittently at all project components. CUL-9 does provide for DCRS discretion regarding specific monitoring requirements. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.7 PALEONTOLOGICAL RESOURCES

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new paleontological impacts. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.8 LAND USE

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new impacts to land use. The underground pipelines would be located within roadway right-of-way for the entire length outside the project site, thus not disrupting or dividing the physical arrangement of the community. The proposed project will not affect compliance with CEC COCs LAND-1, -2, or -3, which will still be met. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.9 SOCIOECONOMICS

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new socioeconomic impacts. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.10 TRAFFIC AND TRANSPORTATION

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new traffic and transportation impacts. It is impractical to use the originally-proposed laydown area at the plant site, which would have resulted in numerous vehicle trips back and forth from areas of construction to the plant site laydown yard. Therefore, the four to five laydown yards have been located evenly along the pipeline route to reduce the amount of construction-related traffic. In addition, there will be a temporary impact at the Tippecanoe Avenue Bridge, but the lane closure will be consistent with other construction areas along the

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pipeline route. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.11 NOISE

The final engineering design of the gas pipeline and additional contractor laydown areas should not result in any new noise impacts. Noise resulting from routine operation of the valve station shall not exceed applicable City of Rancho Cucamonga ordinances. Noise from routine blowdowns will be reduced by controlling the flow of gas and by installation of a silencer on the blowdown stack. The project modifications will not exceed the limits set forth in the COCs for the approved project license and therefore will not result in any new noise impacts.

3.12 VISUAL RESOURCES

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any significant new visual resources impacts. The valve station at East Etiwanda Wash is located in a mixed-use area with the adjacent Southern California Edison (SCE) transmission lines being the most prominent man-made feature. The dimensions of the valve station will be 50 feet north-to-south by 120 feet east-to-west, enclosed by a chain-link fence. Permanent aboveground facilities within the valve station include hand wheel operators for two 10-inch valves, an 8-inch valve, and three hydraulic/pneumatic actuators for the 24-inch valves. Other permanent aboveground facilities include an 8-inch blowdown stack, approximately 8 feet tall, a 24-inch pipe riser and flange at the east end of a 14-foot by 50-foot concrete work slab, and an 8-foot-high chain link fence with two 20-foot vehicle access gates on the south side. In addition, three emergency pedestrian access gates are located along the perimeter of the fence (on the south, north, and west sides of the permanent valve station fence). The 24-inch pipeline and valves will be located below ground. See Appendix B for a site plan and elevation drawing of the valve station. The aboveground facilities at the valve station are shown in a site elevation drawing provided in Appendix B (drawing 95014-009.PLN). The use of nighttime lighting will not be employed. To mitigate visual impacts from the valve station, non-reflective fencing will be utilized as specified in CEC COC VIS-2. Thus, the valve station will result in any new significant visual impacts.

The additional construction laydown areas will involve the use of heavy construction equipment, temporary storage, staging, and office facilities. The laydown areas related to pipeline construction would be temporary in nature. Therefore, new significant visual impacts from the additional laydown areas are expected.

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The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.13 WASTE MANAGEMENT

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new waste management impacts. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.14 HAZARDOUS MATERIALS HANDLING

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new hazardous materials handling impacts. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

3.15 PUBLIC HEALTH

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new significant public health impacts. A fugitive dust mitigation plan has been submitted to the CEC and compliance with this plan will reduce construction-related dust due to trenching and boring activities along the route as well as activities within the designated construction laydown areas. The project modifications will not change the rationale or findings that supported issuance of the license, and no changes to the public health COCs are required.

3.16 WORKER SAFETY

The final engineering design of the gas pipeline and additional contractor laydown areas will not result in any new worker safety impacts. The project modifications will not change the assumptions used in analyzing the impacts of the project nor the COCs for the approved project license.

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3.17 LAWS, ORDINANCES, REGULATIONS, AND STANDARDS

Compliance with the applicable LORS for the proposed project modifications can be accomplished through the LORS identified as part of 00-AFC-2 and the Final Decision for 00-AFC-2.

SECTION 4.0 **PROPOSED MODIFICATIONS
TO CONDITIONS OF CERTIFICATION**

In compliance with the requirements of CEC Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed modifications to COCs that would need to be reviewed and approved by the CEC concurrent with the CEC review of this Amendment. As part of this amendment, there are no proposed changes to the COCs.

SECTION 5.0

POTENTIAL EFFECTS ON THE PUBLIC

Consistent with the CEC Siting Regulations Section 1769(a)(1)(G), this section includes a discussion of how the proposed project modifications affect the public. The proposed modifications will not add any new impacts to the public. The overall alignment of the pipeline has not changed. The proposed changes are directly adjacent to or within the road right-of-way.

SECTION 6.0

LIST OF PROPERTY OWNERS

Consistent with the CEC Siting Regulations Section 1769 (a)(1)(H), this section lists the property owners potentially affected by the proposed modifications. MVPP will provide the names of all property owners who are adjacent to the proposed changes under separate cover.

SECTION 7.0

POTENTIAL EFFECTS ON PROPERTY OWNERS

Consistent with the CEC Siting Regulations Section 1769(a)(1)(I), the following section addressed potential effects on nearby property owners, the public, and the parties in the application proceedings. The proposed changes will not effect any final conclusions associated with the environmental impacts from the MVPP and rationale for granting the facility license. All impacts will be below standards and significance levels or will be mitigated as contained in applicable LORS. The contractor will negotiate with property owners during selection of laydown areas and establish a mutually agreed upon decision.

SECTION 8.0

REFERENCES

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